

# EXHIBIT M

**UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF VIRGINIA  
Charlottesville Division**

ELIZABETH SINES, SETH WISPELWEY,  
MARISSA BLAIR, APRIL MUNIZ, MARCUS  
MARTIN, NATALIE ROMERO, CHELSEA  
ALVARADO, THOMAS BAKER and JOHN  
DOE,

Plaintiffs,

v.

JASON KESSLER, RICHARD SPENCER,  
CHRISTOPHER CANTWELL, JAMES  
ALEX FIELDS, JR., VANGUARD  
AMERICA, ANDREW ANGLIN,  
MOONBASE HOLDINGS, LLC, ROBERT  
“AZZMADOR” RAY, NATHAN DAMIGO,  
ELLIOT KLINE a/k/a/ ELI MOSELY,  
IDENTITY EVROPA, MATTHEW  
HEIMBACH, MATTHEW PARROTT a/k/a  
DAVID MATTHEW PARROTT,  
TRADITIONALIST WORKER PARTY,  
MICHAEL HILL, MICHAEL TUBBS, LEAGUE  
OF THE SOUTH, JEFF SCHOEP, NATIONAL  
SOCIALIST MOVEMENT, NATIONALIST  
FRONT, AUGUSTUS SOL INVICTUS,  
FRATERNAL ORDER OF THE ALT-  
KNIGHTS, LOYAL WHITE KNIGHTS OF THE  
KU KLUX KLAN, and EAST COAST  
KNIGHTS OF THE KU KLUX KLAN a/k/a  
EAST COAST KNIGHTS OF THE TRUE  
INVISIBLE EMPIRE,

Defendants.

**Civil Action No. 3: 17-cv-00072-NKM**

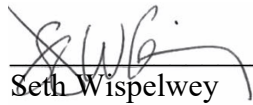
**DECLARATION OF SETH WISPELWEY IN SUPPORT OF PLAINTIFFS’  
SUBMISSION REGARDING VENUE FOR TRIAL AND TRIAL LOGISTICS**

I, Seth Wispelwey, declare as follows:

1. I am a Plaintiff in the lawsuit captioned *Sines v. Kessler*, No. No. 3: 17-cv-00072-NKM.
2. I provide this declaration in support of Plaintiffs' Submission Regarding Venue for Trial and Trial Logistics.
3. The statements made in this declaration are based on my personal knowledge. If called to testify, I could and would testify under oath competently and truthfully to each of the statements in this declaration.
4. I am currently a resident of Tucson, Arizona, where I am a pastor with the United Church of Christ. I have arranged with my employer to take time off work in order to be present in Charlottesville, Virginia for the trial beginning in October 2021.
5. I plan to stay with family and friends who live in Charlottesville for the duration of the trial.
6. I lived in Charlottesville, Virginia for 24 years where I served as a grassroots community organizer and a pastor prior to moving to Tucson in 2019. In a very meaningful sense, I still consider Charlottesville to be my home. Charlottesville is not only where my family and friends still live, but it is where my community and emotional support system remains.
7. If the trial were moved to Lynchburg, Virginia, or Roanoke, Virginia, I would not have the benefit of the support from my loved ones as I relive the traumatic events at issue in the case. Instead, the stress and re-traumatization brought on by the trial would only be compounded by a two to four-hour commute by car each day.
8. More importantly, the community of Charlottesville was forever changed by the events of August 2017; holding the *Sines v. Kessler* trial in the community that still reels from

those traumatic events is critically necessary for healing and recovery. Regardless of the outcome of the trial itself, true justice cannot occur for the Charlottesville community if it does not have the opportunity to witness and participate in the process.

9. I declare under penalty of perjury that the foregoing is true and correct. Executed on June 10, 2021 in Tucson, Arizona.

  
Seth Wispelwey